



and promises, the scheme and artifice being executed in various ways as described more fully below.

**A. Unauthorized AMEX Purchases and Rewards Points Redemption**

4. LF has an AMEX corporate credit card account, and provides certain employees with their own credit cards for payment of approved, business-related expenses. Employee credit cards are issued in the name of LF but display the name of the individual employee cardholder.

5. LF's corporate credit card account accrues membership rewards points that can be redeemed for cash and other items.

6. Tweedie was issued a company credit card ending in 1136 that displayed her former married name Sarah Jauregui ("1136 Card").

7. J.L. is a former LF employee who resigned in approximately September 2017. Prior to her resignation, J.L. was issued a company credit card ending in 1045 that displayed her name ("1045 Card"). Upon her resignation, J.L. handed in her 1045 Card to Tweedie for disposal.

8. It was part of the scheme to defraud that, between approximately July 2017 and January 2018, on one and more occasions, Tweedie used both the **1136 Card** and the **1045 Card** to make numerous unauthorized purchases totaling \$138,137.68, none of which were authorized by LF or were legitimate business expenses. For example,

a. On or about September 14, 2017, Tweedie used the **1136 Card** to purchase a "Gourmia GCM3500 Digital Siphon Artisanal Coffee Machine" (the "Coffee Machine") from Amazon.com for \$89.84;

b. On or about September 16, 2017, Tweedie used the **1045 Card** to have Charter internet service connected at her residence in Belleville, Illinois, and then to make a payment to Charter on the account on or about October 11, 2017, in the amount of \$165.79;

c. On or about October 11, 2017, Tweedie used the **1136 Card** to purchase a “Harris Tweed Women’s Brown Scottish Kilt – Made in Scotland – Green” (the “Scottish Kilt”) from Amazon.com for \$141.00;

d. On or about October 12, 2017, Tweedie used the **1045 Card** to purchase an Amazon Prime subscription from Amazon-UK at a cost of 7.99 Pounds Sterling, which was billed as \$10.56 U.S. dollars;

e. On or about December 9, 2017, Tweedie used the **1136 Card** to pay to FedEx shipping costs totaling \$310.91 related to the shipment of a package from Belleville, Illinois, to an individual in Great Britain; and

f. On or about December 17, 2017, Tweedie used the **1136 Card** to purchase a premium seat upgrade on her United Airlines flights from Chicago, Illinois, to Glasgow, United Kingdom, in the amount of \$1,239.00.

9. It was further part of the scheme to defraud that Tweedie fraudulently, and without permission, used the LF corporate account to purchase Amazon gift cards valued at approximately \$6,400.00, some of which were purchased by redeeming LF’s AMEX rewards points.

**B. Payroll Fraud**

10. As the controller, Tweedie was responsible for processing payroll for all LF employees, including for herself. This included accounting for employee reimbursement expenses – i.e. ensuring that employees were properly reimbursed for any approved, legitimate business-related expenses that they incurred. Pursuant to LF practice and procedure, employees would be reimbursed their approved expenditures on their next regularly scheduled pay check.

11. LF uses Integrated Payroll Services (IPS) for payroll processing. In her role as controller, Tweedie was required to log into IPS’ cloud-based payroll system using her personal

log in, and input payroll data, including hours worked and any legitimate, approved business expenses incurred, for all LF employees. LF's payroll data resides on computer servers physically located in Dulles, Virginia.

12. At all relevant times, Tweedie was authorized an annual salary in the amount of \$80,000.

13. It was part of the scheme to defraud that, on or about October 31, 2017, Tweedie accessed LF's payroll system and fraudulently, and without authorization, changed her annual salary from \$80,000 to \$110,000, thereby causing her to be paid approximately a total of \$4,615.40 more than what she was authorized in November and December 2017.

14. It was further part of the scheme to defraud that, between approximately August 2017 and December 2017, Tweedie accessed LF's payroll system on one and more occasions and caused LF to pay her a total of approximately \$16,086.17 under the guise that this total amount represented legitimate and approved employee expense reimbursements. In truth and fact, Tweedie did not incur any legitimate and approved expenses to which she was entitled to be reimbursed.

### III. Use of the Mail

15. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the same,

**SARAH LYNN TWEEDIE a/k/a SARAH JAUREGUI,**

the defendant herein, did deposit and cause to be deposited matters and things, to wit, products and other items, to be sent and delivered by private and commercial interstate carrier:

COUNT	DATE	TRANSACTION
I	September 14, 2017	FedEx shipment from Lewisberry, PA, to Belleville, IL, containing the Coffee Machine
II	October 12, 2017	FedEx shipment from Edinburgh, Great Britain, to Belleville, IL, containing the Scottish Kilt
III	December 9, 2017	FedEx shipment from Belleville, IL, to Great Britain

All in violation of Title 18, United States Code, Section 1341.

**COUNTS IV-VIII**  
**(Wire Fraud)**

16. The Grand Jury realleges the facts set forth in paragraphs 1 through 14 as if fully set forth herein.

17. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the same,

**SARAH LYNN TWEEDIE a/k/a SARAH JAUREGUI,**

the defendant herein, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures, or sounds, namely the following:

COUNT	DATE	TRANSACTION
IV	October 11, 2017	\$141.00 payment to Amazon to purchase the Scottish Kilt using the <b>1136 Card</b>
V	October 11, 2017	\$165.79 payment to Charter Communications in St. Louis, Missouri, using the <b>1045 Card</b>
VI	October 12, 2017	\$10.56 payment to Amazon-UK to purchase an Amazon Prime subscription using the <b>1045 Card</b>

VII	October 31, 2017	Tweedie accessed LF's payroll system hosted on servers in Dulles, Virginia, and changed her annual salary from \$80,000 to \$110,000
VIII	December 17, 2017	\$1,239.00 payment to United Airlines to purchase premium seat upgrades for Tweedie's flights from Chicago, IL, to Glasgow, United Kingdom, using the <b>1136 Card</b>

All in violation of Title 18, United States Code, Section 1343.

**COUNTS IX & X**  
**(Aggravated Identity Theft)**

18. The Grand Jury realleges the facts set forth in paragraphs 1 through 17 as if fully set forth herein.

19. On or about the dates listed above, within the Eastern District of Missouri,

**SARAH LYNN TWEEDIE a/k/a SARAH JAUREGUI,**

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, the name and unique electronic identification number of J.L., during and in relation to the commission of the felony offenses of wire fraud in violation of Title 18, United States Code, Section 1343, as set forth in Counts V and VI.

In violation of Title 18, United States Code, Section 1028A.

**FORFEITURE ALLEGATION**

The Grand Jury further alleges there is probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1341 or 1343 as set forth in Counts I-VIII, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

---

FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

---

KYLE T. BATEMAN, #996646DC  
Assistant United States Attorney